**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KATIE GHERTNER,	:
	:
Plaintiff,	:
	: **CIVIL ACTION NO.:**
	: **1:19-CV-02295-SDG-RGV**
v.	:
	:
CORPORATE ENVIRONMENTS	:
OF GEORGIA, INC.,	:
	:
Defendant.	:
	:

**JOINT MOTION TO STAY ALL DEADLINES
FOR FORTY-FIVE DAYS PENDING MEDIATION**

Plaintiff Katie Ghertner and Defendant Corporate Environments of Georgia,

Inc. jointly move the Court for a forty-five (45) day stay of all deadlines in the

action pending mediation, including a stay of the parties' deadline for filing the

Consolidated Pretrial Order. In support of their motion, the parties show the Court

as follows:

1.   On July 31, 2020, Judge Grimberg issued his Order in which he adopted

Magistrate Judge Vineyard's Non-Final Report and Recommendation on Plaintiff's

motion for partial summary judgment and Defendant's motion for summary judgment. (Dkt. No. 48.)

2.   Under Local Rule 16.4, the parties are required to submit their Consolidated Pretrial Order within thirty days of Judge Grimberg's Order: August 31, 2020.

3.   Since the parties received Judge Grimberg's Order, they have been preparing the Consolidated Pretrial Order and have been engaged in discussions about a potential resolution.

4.   The parties now seek a stay of all deadlines, including the deadline to file the Consolidated Pretrial Order, so that they can continue settlement negotiations. As part of their negotiations, the parties plan to schedule a mediation, and they expect to hold the mediation within the next two to four weeks.

5.   Should the parties be able to resolve the matter, they will file the necessary documents with the Court to dismiss the case. Should the parties be unable to resolve the matter following mediation, they will inform the Court and address the upcoming deadlines in that filing.

6.   Accordingly, the parties believe that they have demonstrated good cause for a stay of the proceedings and respectfully request that the Court enter an Order granting a stay of all deadlines in the case. A proposed Order is attached.

- 3 -

Jointly and respectfully submitted,

s/ Andrew L. Weiner
   Andrew L. Weiner
   Georgia Bar No. 808278
   aw@atlantaemployeelawyer.com
   Jeffrey B. Sand
   Georgia Bar No. 181568
   js@atlantaemployeelawyer.com
   WEINER & SAND LLC
   800 Battery Avenue SE
   Atlanta, GA 30339
   Telephone: 404-254-0842
   Facsimile: 866-800-1482

   Counsel for Plaintiff

s/ Alexandra Bowen Higgins
   Alexandra Bowen Higgins
   Georgia Bar No. 071105
   Alexandra_bowen@staffdefense.com
   3740 Davinci Court
   Suite 440
   Peachtree Corners, GA 30092
   Telephone: 770-381-6175

   Counsel for Defendant

Date: August 17, 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

KATIE GHERTNER,	**:**
	:
Plaintiff,	**:**
	:
	: CIVIL ACTION NO.:
	: 1:19-CV-02295-SDG-RGV
v.	**:**
	:
CORPORATE ENVIRONMENTS	**:**
OF GEORGIA, INC.,	**:**
	:
Defendant.	**:**
	:

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2020, I filed the foregoing ***JOINT***

MOTION TO STAY ALL DEADLINES FOR FORTY-FIVE DAYS PENDING

MEDIATION with the Clerk of Court using the CM/ECF system, and e-mail

notification was separately sent to all counsel of record:

s/ Andrew L. Weiner
Andrew L. Weiner
Counsel for Plaintiff

4

- 5 -

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

KATIE GHERTNER,	**:**
	:
Plaintiff,	**:**
	: CIVIL ACTION NO.:
	: 1:19-CV-02295-SDG-RGV
v.	**:**
	:
CORPORATE ENVIRONMENTS	**:**
OF GEORGIA, INC.,	**:**
	:
Defendant.	**:**
	:

<u>ORDER</u>

For good cause shown, the Joint Motion to Stay All Deadlines For Forty-Five Days Pending Mediation is hereby GRANTED. All deadlines in this matter are hereby stayed for forty-five (45) days. The parties are ORDERED to report to the Court following mediation on the status of the case.

SO ORDERED this _____ day of August 2020.

_____
United States Magistrate Judge

Error! Unknown document property name.